

NOTICE:

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DOCUMENT ARE ILLEGIBLE**

The Administrative Record Staff

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Memorandum to: Shirley J. Olinger
Safety Division Director
Rocky Flats Office

August 9, 1990

This is a response to your memorandum regarding the OSHA required training for access to hazardous substances areas. For some reason the January 8, 1990, memorandum was not explicit enough, but the way the OSHA regulation 1910.120(e) is being interpreted by both DOE and OSHA, everyone entering a waste site must have the requisite training unless they are able to demonstrate that by prior experience and training (1910.120(e)(9)) that they have had the equivalent of the initial training. This should be documented.

If their training and experience used to satisfy the initial training requirement is more than a year old, they then must have had within the past year the requisite eight hour refresher training required by 1910.120(e)(8). Being escorted onto a hazardous waste site does not satisfy these requirements, and would be a violation of OSHA regulations as well as provide a false sense of security. The intent of the regulations is to assure that each individual is able to respond to emergency situations on a hazardous waste site to protect their own safety.

I will provide a more formal response at a later date if you wish.



John Teske
Acting Director
Worker and Facility Safety

cc: Joe Krupar

DOE-HQ

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ADMIN RECORD

A-SW-001705